

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

No.: CR 18-2945-WJ

JANY LEVEILLE,
SIRAJ IBN WAHHAJ,
HUJRAH WAHHAJ,
SUBHANAH WAHHAJ, and
LUCAS MORTON,

Defendants.

MOTION FOR EXTENSION OF TIME TO FILE MOTION

Defendant Hujrah Wahhaj by and through her appointed counsel, respectfully moves this Court for an extension of time to file a *Daubert* motion to exclude or limit the testimony of a proposed Government expert witness, and in support thereof would respectfully show the court as follows:

1. Pursuant to the scheduling order entered by the court on November 22, 2022 [Doc. 529] *Daubert* motions are due by Monday, May 1, 2023.
2. Counsel for Defendant is in trial during the week of May 1, 2023.
3. Counsel requests an extension of time for the filing of a *Daubert* Motion, to Monday, May 15, 2023.
4. Counsel attempted to contact Assistant United States Attorneys Kimberly Brawley and Tavo Jackson Hall by e-mail but have not yet received a response.

WHEREFORE, Defendant Hujrah Wahhaj, respectfully requests this Court enter an Order extending the due date for Defendant's filing of a *Daubert* motion to Monday, May 15, 2023, and providing for such other and further relief to which the parties to be justly entitled.

Respectfully submitted,

/s/ Donald F. Kochersberger III

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Attorneys for Defendant Hujrah Wahhaj

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2023, a copy of the foregoing document was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Donald F. Kochersberger III

Donald F. Kochersberger III